

Daniel S. Weinberger
Associate

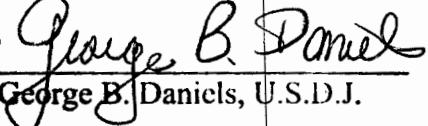
Gibbons P.C.
One Pennsylvania Plaza
37th Floor
New York, NY 10119-3701
Direct: 212-613-2063 Fax: 212-554-9632
dweinberger@gibbonslaw.com

December 6, 2019

FILED & SERVED ELECTRONICALLY (via ECF as a Letter)

Hon. George B. Daniels
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

SO ORDERED:


George B. Daniels, U.S.D.J.

Dated: DEC 09 2019

Re: *Bridgeton Landfill, LLC v. Mallinckrodt LLC and Everzinc USA, Inc.*
Miscellaneous Action No. 1:19-mc-00540

Dear Judge Daniels:

We represent non-party Citigroup Inc. ("Citigroup") in the above-captioned miscellaneous action, wherein plaintiff Bridgeton Landfill, LLC ("Plaintiff") has filed a motion to compel production of documents from Citigroup pursuant to Fed. R. Civ. P. 45(d)(2)(B)(i) ("Motion to Compel"), relating to a subpoena issued out of the United States District Court for the Eastern District of Missouri in *Bridgeton Landfill, LLC v. Mallinckrodt LLC and EverZinc USA Inc.*, Civil Action No. 4:18-cv-01800-RWS. We write, with Plaintiff's consent and pursuant to Rule II.C of Your Honor's Individual Rules, to request an extension of the briefing schedule on Plaintiff's Motion to Compel such that (a) Citigroup's response to Plaintiff's Motion to Compel will be due on or before December 20, 2019 and (b) Plaintiff's reply, if any, may be filed on or before January 8, 2020.

In support of this request, Citigroup states:

1. Citigroup agreed to waive formal service of Plaintiff's Motion to Compel and accept electronic service through counsel on November 26, 2019, provided that Plaintiff agreed to grant Citigroup an extension of time to respond to the Motion to Compel. Assuming service was completed on November 26, 2019, Citigroup's response would have been due on or before December 10, 2019 and Plaintiff's reply would have been due on or before December 17, 2019, pursuant to Local Civil Rule 6.1(b).

2. No previous request for an adjournment or extension of the briefing schedule on this Motion to Compel has been made.
3. Plaintiff consents to this request for an extension of the briefing schedule.
4. The parties reserve all rights and defenses in this miscellaneous action.

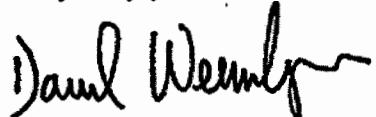
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Accordingly, Citigroup respectfully requests that the Court approve the following briefing schedule on Plaintiff's Motion to Compel:

- (a) Citigroup shall file its response to Plaintiff's Motion to Compel on or before December 20, 2019; and
- (b) Plaintiff may file its reply, if any, on or before January 8, 2020.

Please have a member of your staff contact the undersigned should the Court have any questions.

Very truly yours,



Daniel S. Weinberger

cc: *All counsel of record* (via ECF)